

United States v. John Stuart  
21-CR-07-LJV-JJM

Defendant's Exhibit A

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**From:** Jeffrey Bagley  
**To:** "Rudroff, David (USANYW)"  
**Subject:** RE: John Stuart: Protective Order  
**Date:** Thursday, December 22, 2022 3:18:00 PM

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Sure thing.

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Jeffrey T. Bagley  
Assistant Federal Public Defender  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** Rudroff, David (USANYW) [REDACTED]  
**Sent:** Thursday, December 22, 2022 3:16 PM  
**To:** Jeffrey Bagley [REDACTED]  
**Subject:** RE: John Stuart: Protective Order

I understand. I will file a consent motion tomorrow.

If I send you documents before it is formally entered, can we agree to treat them in accordance with the anticipated PO? If so, I can likely get you what I have a few days faster.

**David J. Rudroff| Assistant United States Attorney| United States Attorney's Office |**  
**Western District of New York**  
[REDACTED]

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**From:** Jeffrey Bagley [REDACTED]  
**Sent:** Thursday, December 22, 2022 9:57 AM  
**To:** Rudroff, David (USANYW) [REDACTED]  
**Subject:** [EXTERNAL] RE: John Stuart: Protective Order

Dave – I don't have a problem with this as it stands now. Obviously, I may ask for parts or all lifted if I feel it appropriate after reviewing the materials.

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Jeffrey T. Bagley  
Assistant Federal Public Defender

[REDACTED]

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**From:** Rudroff, David (USANYW) [REDACTED]  
**Sent:** Friday, December 16, 2022 2:11 PM  
**To:** Jeffrey Bagley [REDACTED]  
**Subject:** John Stuart: Protective Order

Jeff,

I've attached the government's proposed protective order. Let me know your thoughts.

**David J. Rudroff | Assistant United States Attorney | United States Attorney's Office |  
Western District of New York**

[REDACTED]